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September 21, 1998

EX PARTE OR LATE FILED

The Honorable William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Kennard:

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Association of State Nine One One Administrators ("NASNA") have consistently supported the concept of establishing a threshold signal level for adequate communications with Public Safety Answering Points ("PSAPs") when the digits 9-1-1 are dialed from an analog cellular telephone. We also believe that where such a threshold level is not met, there needs to be an alternative path to ensure that the 9-1-1 call will get through to the PSAP. The appropriate threshold and the alternative path for completing calls that fall below that threshold are matters that require analysis and validation by appropriate technical bodies.

We have not supported the "strongest signal" proposal offered by the Ad Hoc Alliance for Public Access to 911 ("Alliance"), due to concerns regarding the impact on 9-1-1 networks. We documented our concerns with that proposal in a submission to the Commission on February 23, 1998 from APCO, NASNA and NENA, the National Emergency Number Association. More recently, on September 17, the Alliance submitted a modified proposal to the Commission which reflects at least some aspects of an "adequate signal" approach. While the Alliance inappropriately attempts to characterize our position regarding this latest proposal, we do acknowledge that it is a significant step in the right direction. The Alliance now appears to agree that the best solution is to attempt to establish a threshold for "adequate" communications (which may not be on the "strongest

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signal") and an alternative path to the PSAP for when that threshold is not met However, we are not prepared to support the specifics of the modified Alliance proposal, which still contains some significant technical problems.

We believe that the Commission needs to move forward on this issue, which has already diverted attention from pressing matters regarding implementation of Phase I and Phase II. Therefore, we urge that the Commission charge appropriate technical bodies with the task of determining a recommended threshold for adequate signal level, and process for delivering to the PSAP 9-1-1 calls that fall below that threshold. In addition to the relevant Telecommunications Industry Association standards committee (TR.45), this issue should be referred to WEIAD (Wireless Enhanced 9-1-1 Implementation Ad Hoc) which was formed to address technical wireless/9-1-1 issues. The Alliance proposal, and technical solutions, should be examined and resolved by WEIAD and TR.45 as quickly as possible.

We remained committed to working with the Commission and other parties to address this and other 9-1-1 issues.

Respectfully submitted.

Jack Keating	James Beutelspacher
President	President
APCO	NASNA

Cc: Leah Senitte
President
NENA